



Code of Ethics



Table of Contents

Leadership message.....3

Introduction.....4

Scope.....4

Building a thriving business.....5

Protect Company assets and confidential information5

Care for Company property5

Maintain accurate Company records.....6

Avoid conflicts of interest 7-8

Compete fairly and earn our market success.....9

Protect our company’s reputation and integrity10-12

Carefully select the third parties we do business with 13

Building a thriving workplace.....14

Maintain a respectful workplace.....14

Prohibit discrimination, harassment, and intimidation14

Treat everyone with respect both in person and on social media.....14

Value organizational justice.....15-16

Respect freedom of association17

Protect our associates.....17

Expect a drug/alcohol free workplace17

Ensure confidentiality of our associates’ information.....17

Provide associate training and education17

Make ethical decisions.....18

Accountable for sound clinical decisions19

Building thriving communities.....20

Protect our customers and treat them with respect and fairness20

Ensure our associates are appropriately licensed and qualified21

Protect customers’ privacy and security of their data.....21

Ensure our services are accessible to all22

Helping to ensure a thriving planet.....23

Leadership message

The world we all live in today is constantly changing. The rapid pace of new developments can be dizzying, not only within our organization and healthcare in general, but also in the way we all communicate, live, and how we nourish and protect our families.

One thing, however, remains constant – Rite Aid’s commitment to integrity. For more than sixty years, we have helped our customers achieve whole health for life. We have done so by earning the trust of our customers, associates, shareholders, and communities through our dedication to serving people in accordance with the highest of ethical standards.

This new Code of Ethics has been designed as a resource and tool to guide us and those we do business with in making ethical decisions. It embodies our shared corporate values of Getting There Together and Earning Trust And Keeping It. We know trust is not something that is guaranteed; it is something we have to earn every day by acting with integrity always and delivering on our commitments. We also know we can achieve anything as long as we are open and honest in our communications and stay connected with each other.

Getting There Together means each of us is responsible for using this Code thoughtfully and bringing its principles to life through our conduct each day. If you have a question or concern about how to apply this Code to your particular role, or if you become aware of a potential violation of the principles reflected

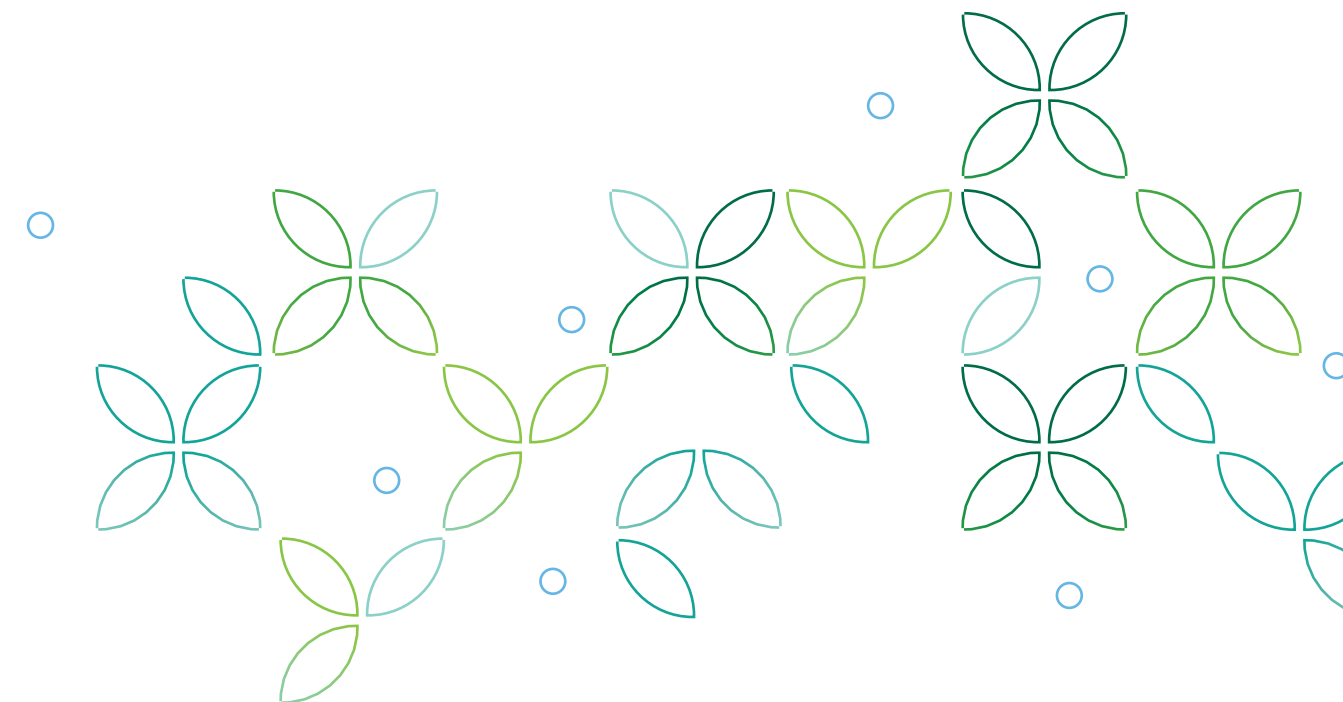
in this Code, please contact your manager, the Compliance team, or use our Ethics Line at 888-748-3225 or via the website [RiteAid.com/legal/fraud-ethics-compliance-hotline](https://www.RiteAid.com/legal/fraud-ethics-compliance-hotline), which is available 24 hours a day, every day of the year. Learning of potential issues early enables us to take quick corrective action to protect both each other and our customers.

We foster and operate in an ethical culture where we encourage associates who “see something” to “say something”. Everyone who speaks up in good faith about a concern will be protected - we will not tolerate retaliation of any kind.

We are so proud to work for Rite Aid and excited to enhance our long history of acting with integrity with this new Code of Ethics as an additional tool we can all use to honor the commitments we have made not only to each other but to those we serve.

Sincerely,

The Rite Aid Chief Ethics & Compliance Officer and Executive Leadership Team



Introduction

Scope

This Code of Ethics (the “Code”) applies to all directors, officers and associates of Rite Aid Corporation, including its consolidated subsidiaries and joint ventures in which it holds a controlling interest, as well as those persons who perform work for or on behalf of the Company (“Rite Aid” or “the Company”).

In addition to this Code, the Company has established policies, internal procedures, and processes (collectively “Policies”) that supplement this Code and may apply to your role. This Code should be read and interpreted along with our policies and internal procedures, which can be found on the SPOT RiteAid.retailzipline.com/library/resources/7c7cec6a-policies. All associates are required to comply with this Code as well as all Policies.

Where laws and regulations in a particular location are more lenient than those contained in this Code, you are still required to act in accordance with this Code. Nothing contained in or implied by this Code creates, nor shall be deemed to create or constitute any legal obligation on the part of the Company. The provisions of this Code are subject to change from time to time and do not create any right to employment, nor do they alter the at-will employment relationship for non-union associates.



We are building a thriving business

We protect Company assets and confidential information

Confidential business information includes customer information, financial data, pricing and payments, business strategies, associate records, operations, acquisitions, divestitures, client information, affiliations and mergers, and marketing plans. It also includes intellectual property including our proprietary computer software, copyrights, patents, and trademarks.

Examples of how we protect the confidential information with which we are entrusted:

- Use Company information for business purposes only and never for personal gain
- Make sure there are legitimate business reasons for disclosing information
- Obtain a confidentiality agreement approved by the Legal Department before sharing confidential information with anyone outside of the Company
- Avoid discussing confidential information in public areas where others may overhear
- Do not share confidential information from former employers, and do not share our confidential information with future employers
- Return all confidential information when you leave the Company

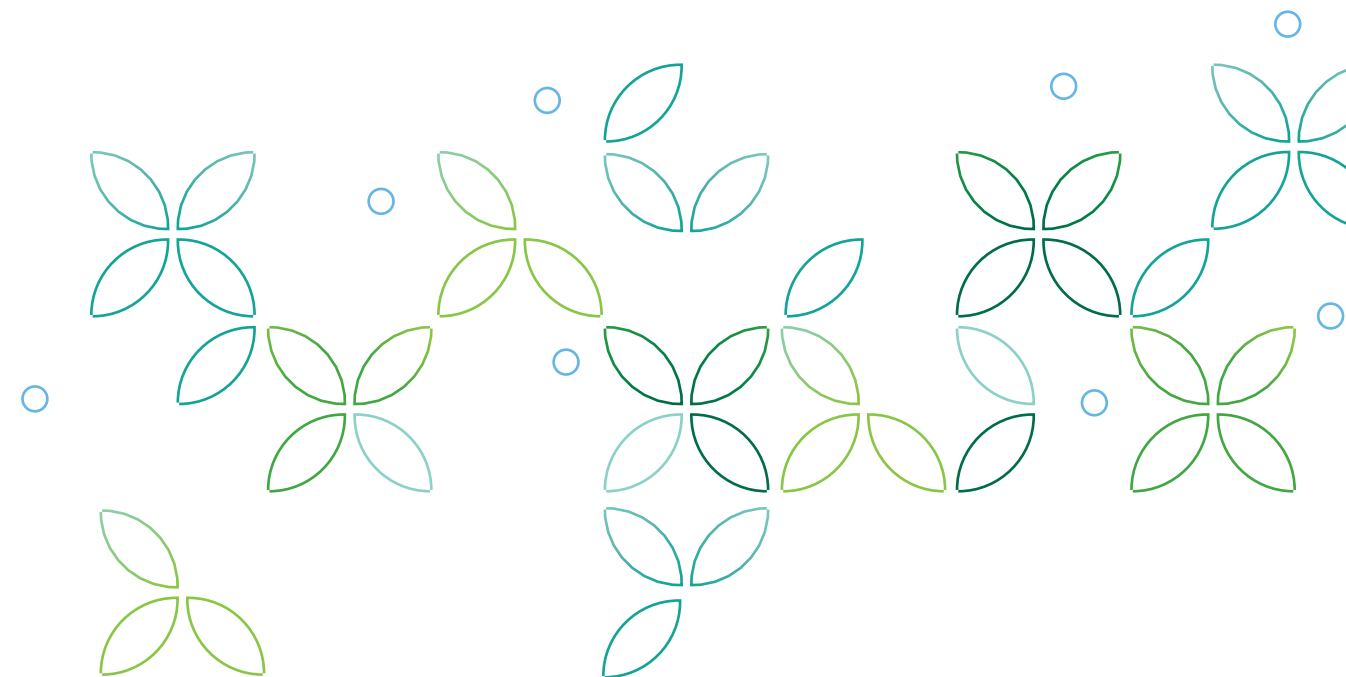
We also have a responsibility to respect and protect Company assets such as associate time, facilities, property, supplies, equipment, technology, computer software, data, and information systems. Limit work time activities to only work-related matters.

We care for Company property carefully and as if it were our own:

- Do not download or install unauthorized software or applications
- Safeguard access to your computer by protecting passwords and logging off at the end of your workday
- Never lend, sell, or give away Company property unless you are authorized to do so

Occasional personal use of company assets, such as telephones, is permitted as long as it does not violate Company policies, incur additional company costs, or interfere with your work or the work of others.

Keep in mind that the Company has the right to review and monitor system use, including Company email, at any time without notifying associates, to the extent permitted by law.



We are building a thriving business

We maintain accurate Company records in keeping with our retention schedules

Having accurate, complete, and timely records inspires trust in our people, our products and our processes and demonstrates integrity to our stakeholders.

We follow our policies and records retention schedule to ensure retention and destruction of our records in accordance with legal and regulatory requirements, and to properly organize and store our records, whether electronic or hard copy. We preserve and do not destroy records that are subject to legal holds or retention schedule requirements. In our daily work, we stay alert for irregularities or inaccuracies in our records, and never give in to pressure from anyone else to falsify a record or ignore something unethical.

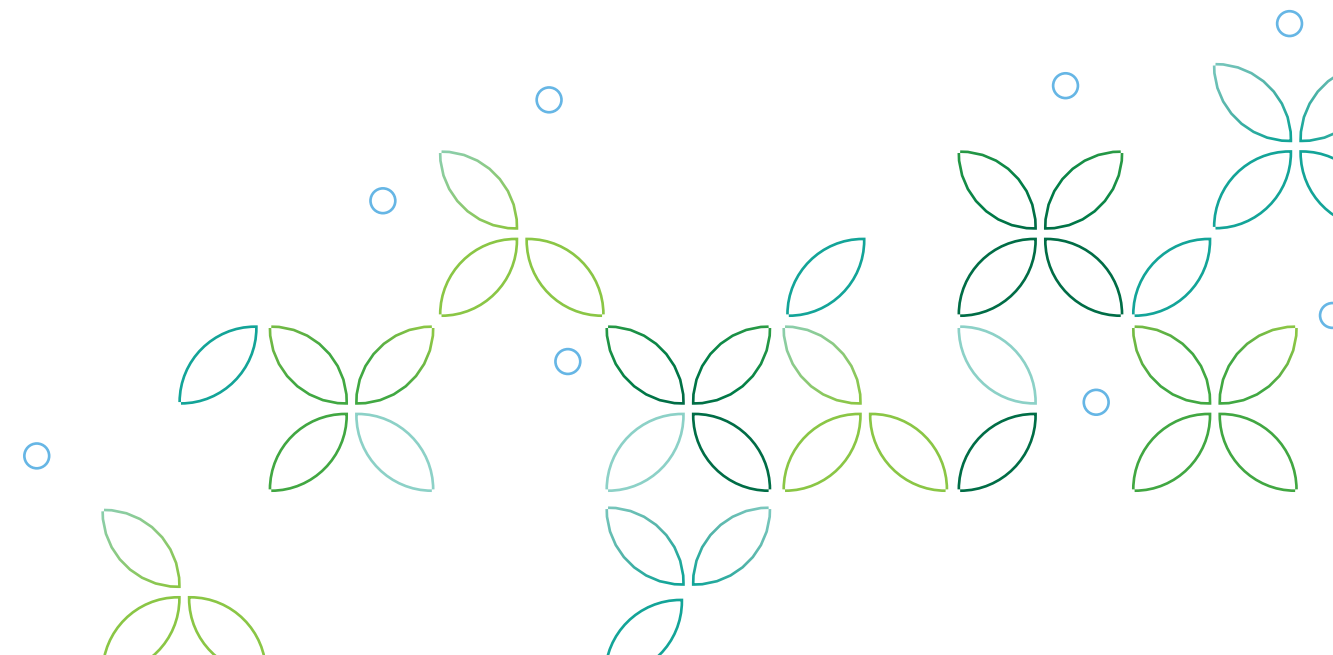
Financial Records

We take special care in ensuring the accuracy of our financial records which include, for example:

- Expense reports

- Statements of earnings or losses
- Payroll and tax records
- Timesheets
- Invoices or purchase orders
- Benefit claims

We never knowingly engage in activities that may endanger the accuracy of our financial records, nor do we conduct business with individuals unwilling to provide us with accurate and complete records of our business dealings with them. Any suspicious practices including refusal to provide required receipts or use of vague and unspecified descriptions of services could be a sign of fraud, bribery, or some other illegal act. We do not ignore suspicious behavior; we report it immediately.



We are building a thriving business

We avoid conflicts of interest

Maintaining trust with our associates and customers requires uncompromising integrity. That means, in part, steering clear of potential or actual conflicts of interest. We understand the importance of keeping business interests separate from our personal activities and relationships and avoid actions that create—or even appear to create—conflicts of interest.

A conflict of interest occurs when an associate or their immediate family member is involved in an activity that affects, or appears to affect, their objectivity in making decisions on behalf of the Company. Although it is not possible to list every situation where a conflict can arise, there are certain situations where conflicts typically happen. Recognizing these situations is the first step in avoiding them.

Examples of situations that may lead to conflicts of interest:

- Other jobs: the Company does allow associates to have other jobs, but while working on Company time, our number one priority is to the Company
- Participation in political or charitable activities
- Using a Company business opportunity for personal gain
- Personal relationships between associates in the same direct reporting line
- Family members who work for a competitor or a company that does/wants to do business with our Company
- Owning or investing in a competitor or a company that does/wants to do business with our Company

In most circumstances, conflicts of interest can be managed if they are promptly disclosed. Associates who become aware of a potential conflict or have

questions about conflicts of interest should discuss it with their supervisor or the Compliance & Ethics department.

Example:

Q: “My brother is looking for a new job and my department is hiring. He has the qualifications and experience we need. Is it okay for me to hire him or is this a conflict of interest?”

A: “While your brother is welcome to apply for the position, you may not be involved in the interview or hiring process. Your involvement would create a conflict of interest because your desire to help your brother could impact your ability to be impartial in your decision making for the Company. In this situation you should promptly disclose the potential conflict to your supervisor and to the Compliance and Ethics team and remove yourself from any involvement in determining whether or not to hire him. If your brother is hired without your involvement, note that it would still be a conflict of interest for one of you to report to or supervise the other. You may both work for the Company, but not in the same reporting line.”

Gifts

Exchanging gifts, meals, and entertainment is a customary business practice with vendors and suppliers, however we must still avoid situations that may create a conflict of interest or even the appearance of one. Anything we give or receive must:

- Be given or received with appropriate intent and not in exchange for any improper action or inaction or to influence the decision making of the recipient
- Never be offered during a contracting, negotiation, or bidding period

We are building a thriving business

- Never be solicited
- Never be given to a medical provider, plan member, labor organization, or government official
- Gifts must not exceed \$200 per person annually, not be offered more than quarterly, not be lavish or excessive, and not be cash or cash equivalent (such as gift cards)
- Meals should be commensurate with the cost of meals permitted on a Company business trip pursuant to the Company's Travel and Expenses Policy and should not be given or received more than once in per quarter
- Entertainment should be attended by both parties, take place at a venue that would not reflect negatively on the reputation of the Company, be considered modest by local standards and should not be given or received more than twice in any twelve-month period

There are more significant restrictions when it comes to healthcare professionals, customers, labor organizations, and government officials. We have a zero-gifts policy with these third parties which applies to both giving and receiving gifts.

For more information, please consult the Gifts, Meals and Entertainment Policy before offering or accepting anything of value.

RiteAid.retailzipline.com/library/documents/de9ca78d-compliance-policy-03-01-gifts-meals-and-entertainment-policy-pdf

Insider Trading

Many associates are shareholders of the Company and must comply with both federal securities laws and Company policy regarding stock trades.

Buying or selling a company's stock based on material, nonpublic information is called "insider trading," and it is against the law. Never buy or sell based on this information or share it with anyone outside of the Company, including friends or family. "Tipping" others to buy or sell based on inside information is also illegal.

Through the course of our work, we may each have access to material, nonpublic information about our Company or the companies with which we work; information which investors would consider valuable in deciding whether to buy, sell or hold company stock.

Inside information could include, for example:

- New or lost contracts or products
- Unannounced dividends, earnings, or losses
- Changes in leadership
- Potential mergers or acquisitions
- Business plans

Information is considered "public" if it has been released to the public (through a press release, for example) and an adequate period of time has passed for markets to digest the information. In general, a delay of two business days is considered acceptable but, in some cases, a longer period may be required.

Do not take chances—if you are unsure about what kind of information is considered inside information or whether or not you may buy or sell, seek help from the Legal department.

We also respect every other company's right to protect its confidential, nonpublic information. If we have access to such inside information about other companies, we may not use it to buy or sell stock or tip anyone else to do so.

We are building a thriving business

We compete fairly and earn our market success

Fair Competition

Competition laws can be complicated, but they work to level the playing field among competing companies, so that each has the same ability to succeed. We interact fairly with competitors, in compliance with the law, and avoid any activity that could harm others' ability to compete.

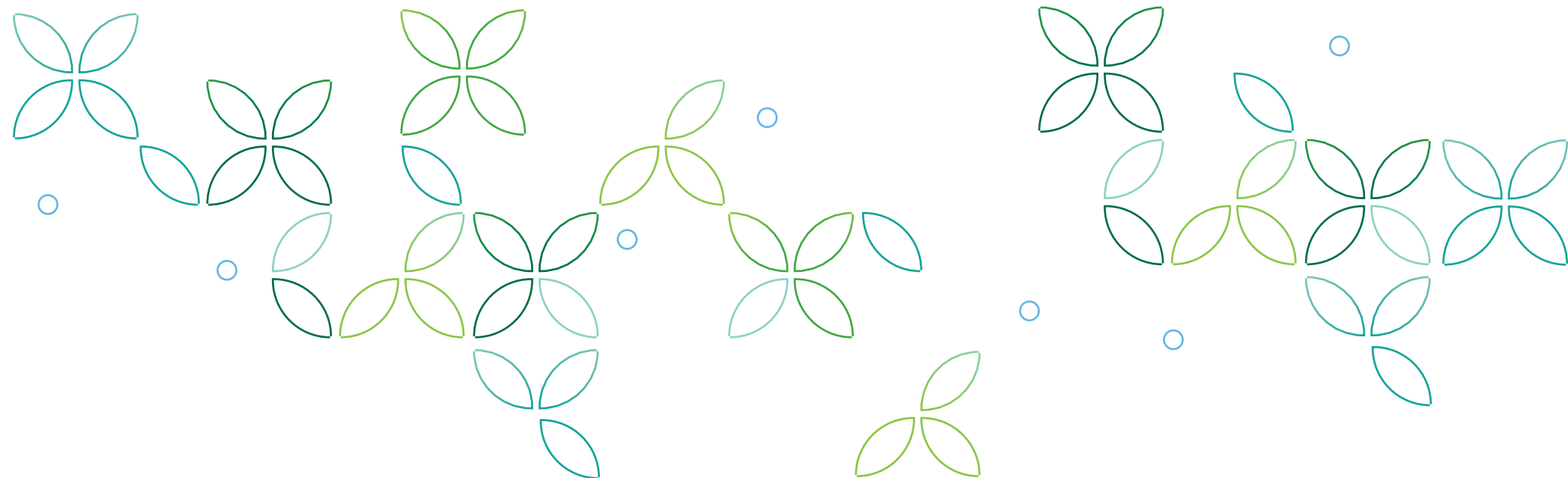
We are proud of the work we do. We rely on the quality of our work to achieve success without resorting to unfair competitive practices. This approach helps us uphold antitrust, competition and consumer laws, which support open competition and a fair and free marketplace.

When seeking information about our competitors, we only use publicly available information. We are also careful to protect our confidential information and avoid sharing proprietary information with our competitors.

Example:

Q: "I am attending a conference where a number of people from our competitors are also present. In a conversation over lunch, a competitor suggests we should start a group chat to share information about a particular pricing strategy for specific categories of over the counter (OTC) products so we can help each other. Should I join the group chat?"

A: "No. Conversations with competitors may lead to the sharing of inappropriate information, such a pricing strategies or advertising campaigns, and unfair competition. You should voice your concerns and leave the conversation and immediately contact the Compliance and Ethics team to report your concerns."



We are building a thriving business

We protect our company's reputation and conduct business with integrity

We prohibit bribery and corruption

We earn business honestly and transparently and never give or accept anything of value in exchange for a business decision. Nothing of value, including gifts, meals, offers of entertainment or travel—regardless of value or the frequency with which it is offered—is appropriate when it's given to obtain a favorable decision, an improper advantage, or a referral. We operate with integrity and do not tolerate bribes or kickbacks of any kind. As Company associates, we will not tolerate illegal activities or corruption in our business dealings and/or interactions with associates, pharmacies, vendors, plan members, health plan clients, and prescribers.

We handle media inquiries carefully

Unless we have been specifically authorized to speak on the Company's behalf regarding business matters, we direct media questions and requests to the Public Relations Department. This best practice ensures regulators, government agencies, media outlets and the general public have consistent, accurate and timely information about our business.

We comply with the law

We operate in a highly regulated industry with a set of federal and state standards that are far-reaching and complex. We follow all of the laws and regulations that apply to our jobs. Failing to comply with laws or regulations

can have serious consequences—it can compromise an individual's health and violate the trust people place in us.

a. We comply with Anti-Kickback Laws

We comply with applicable federal and state anti-kickback laws and regulations. These laws prohibit the receipt or payment of something of value (cash, entertainment, gifts, etc.) intended to encourage purchasing or ordering of an item (such as prescription drugs) or a service that may be reimbursed under a government health care program. Routine waiver of co-insurance and/or co-payments may be considered a kickback to a patient, so we are careful to avoid this.

b. We prevent Fraud, Waste and Abuse

Along with a commitment to handling patient health information with integrity as outlined by HIPAA patient privacy regulations, we are committed to truth, accuracy, and integrity in the billing of prescriptions and other health care services. This is our policy whether billing to government health programs or to private third-party payers. We do not tolerate fraud, waste, or abuse, including, but not limited to, business dealings and/or interactions with the Company's associates, retail stores, non-participating and network pharmacies, vendors, plan members, health plan clients, prescribers, and customers. We proactively seek to prevent, detect, report, correct, and when appropriate, refer to law enforcement agencies and all applicable regulatory agencies, instances of actual or suspected fraud, waste, or abuse.

We are building a thriving business

We comply with all Government Contract and Program Requirements. In all applicable components of our business, especially as a Medicare Part D plan sponsor, a pharmacy benefit manager to clients that operate their own Medicare plans, and a retail pharmacy, we comply with the requirements that govern those programs. We are accurate and complete in our coding and billing and do our part to prevent, detect and correct fraud, waste, or abuse of the system.

We are committed to accuracy in billing for our services to government health programs and private third-party payers. Associates who provide pharmacy services or prepare and submit claims for pharmacy services are expected to comply with all Federal health care program requirements, including the preparation and submission of accurate billing consistent with the requirements of Federal health care programs and the Company's policies and procedures regarding those programs and private payers.

Failure to comply with Federal health care program requirements or with Company policies and procedures, may result in the possibility of disciplinary action up to and including discharge. Individual associates and the Company also face the possibility of civil and criminal fines and other punishment (including imprisonment for individuals) for health care fraud. Anyone convicted of health care fraud also faces the possibility of being placed on the Federal exclusion list, which will make them ineligible to participate in Federally funded health care programs. You are required to report any suspected violations of Federal health care program requirements or of Company policies and procedures regarding these programs or billing to any third-party payers. Suspected violations should be reported to your immediate Supervisor and/or

Manager, and Human Resources Leader:

- Rite Aid Ethics Line (for Rite Aid and Elixir associates) at 888-748-3225 or via the website [RiteAid.com/legal/fraud-ethics-compliance-hotline](https://www.riteaid.com/legal/fraud-ethics-compliance-hotline).
- Health Dialog Ethics Line: 877-277-5900 x 4555

All reports will be maintained in confidence to the extent appropriate and no associate will be retaliated against for making a good faith report. If you fail to report a potential violation, you face the possibility of disciplinary action, up to and including discharge.

Please refer to the applicable policies posted to the SPOT and the annual Fraud, Waste and Abuse training material.

c. We prevent Money Laundering

Money laundering is the act of disguising the illegal source of money. Criminals try to hide the source of money obtained through illegal activities ("dirty money"), so it looks like it was obtained from legal sources ("clean money"). Drug traffickers, organized crime, and terrorists are examples of the groups that participate in money laundering. We never knowingly engage in activities or conduct business with individuals involved in money laundering.

d. We recognize Fundamental Human Rights

We support the principles established under the United Nations Universal Declaration of Human Rights. We prohibit the employment of children under the legal employment age and prohibit forced labor of all kinds, as well as any form of physical punishment or abuse. We expect suppliers throughout our global supply chain to share our commitment to the same high standards.

We are building a thriving business

e. We comply with Financial Laws and Regulations

We understand the importance of having accurate financial records. We never falsify or alter any financial record, no matter how small. We record all transactions properly, and never delay or accelerate reporting of profits or expenses. In our public financial disclosures, we ensure the information we report is clear, complete, accurate and timely. In our daily work, we stay alert for irregularities or inaccuracies in our records, and do not give in to pressure from anyone else to falsify a record or ignore something unethical.

f. We comply with HIPAA and all other Privacy Laws

We are people who respect the personal information of others. We share a commitment to maintaining the privacy of personally identifiable information (PII) and protected health information (PHI) and adhering to the laws and policies that are designed to safeguard such information. We use information only in the way it is intended to be used and collect only the minimum PHI or PII needed to perform our work and—whether verbal, written or electronic—use it only for legitimate business purposes. By knowing and following our policies, we help ensure compliance with the Health Insurance Portability and Accountability Act (HIPAA), the Health Information Technology for Economic and Clinical Health Act (HITECH) and all other privacy laws and requirements that apply to our work. We must each do our part to protect and secure confidential information. Both PII and PHI are confidential and may be disclosed only in accordance with state and federal law. We grant access only to those who are authorized to know the information, need it to perform their jobs and are obligated to protect it.

g. We use honest prescription billing practices and comply with the Federal False Claims Act. The False Claims Act can be applied to almost any situation where federal dollars are involved, especially federal health care programs such as Medicaid and Medicare. The Federal False Claims Act allows the federal government to recover fraudulent healthcare costs and to deter others from submitting them. To protect public health and public finances, this law prohibits anyone from knowingly receiving an improper payment from the federal government. Knowingly means that the person is actually aware that information is false but presents it as true. If a person keeps him or herself deliberately ignorant of the truth or disregards the truth in a reckless manner, that can also be the equivalent of having knowledge. Associates who have completed Fraud, Waste, and Abuse training should know the law and may be personally liable for submitting improper claims for payment.



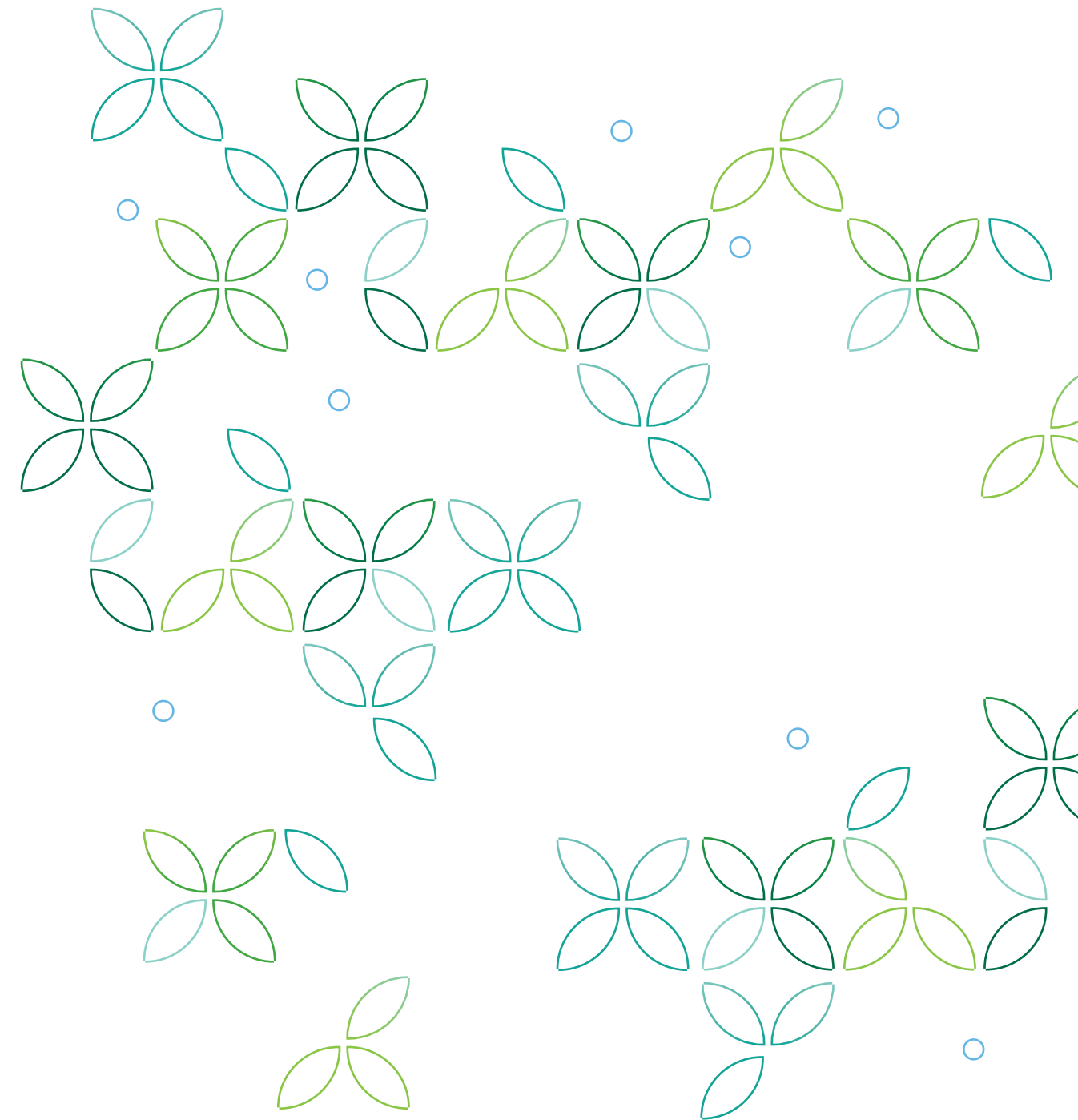
We are building a thriving business

We carefully select the third parties with whom we do business.

We value our partnerships with vendors and suppliers. We select business partners based on their ability to meet our business needs and willingness to commit to working together in a way that is free from conflicts of interest (see separate section on conflicts of interest above), and consistent with all applicable laws and good business practices. We choose carefully. When selecting business partners, we base our decisions on objective criteria—quality, service, price, delivery, and experience—not personal relationships or friendships.

In our work with our vendors or suppliers, we:

- Expect that they honor the law and our policies and procedures, including those related to gifts, meals, and entertainment (see section on gifts - pages 7-8)
- Encourage them to adopt their own standards of ethics consistent with their industry's best practice
- Protect their confidential personal and business information
- Report any unethical or illegal conduct that we see or suspect



We are building a thriving workplace

We know that one of our Company's most important resources are our associates — they are the key to our success as a company. The following principles, designed in alignment with the United Nations (UN) Declaration of Human Rights and relevant International Labor Organization (ILO) Conventions, are based on the importance of respect for the individual, ensuring equality of treatment and prevention of any form of discrimination. We support the protection of fundamental human rights for all.

We maintain a respectful workplace

We seek to maintain a cooperative and supportive working environment in which the dignity of each individual is respected. We are committed to Diversity, Equity, and Inclusion and know that diversity of opinion and perspective leads to better decision making and a stronger and more vibrant organization.

We prohibit discrimination, harassment, and intimidation

We prohibit behavior intended to create, or that might have the effect of creating, an intimidating or offensive climate and work to prevent any type of sexual or other form of harassment. We are committed to providing equal opportunities to all of our associates through every aspect of employment including recruitment, training, compensation, promotion, transfer, and termination. We believe in equal pay for equal work and take steps to mitigate

any disparities. All associates are treated with respect and in accordance with their ability to meet applicable position requirements. We make employment decisions based only on an individual's qualifications and abilities. All decisions related to the employment of associates must be free from any form of discrimination including discrimination based on race, color, creed, gender identity, sexual orientation, social status, physical or mental health condition, pregnancy, physical/mental disability, age, nationality, religion, political opinion, marital status, citizenship status, genetic information, status as a protected veteran, personal beliefs or any other characteristic protected by law.

We treat everyone with respect both in person and on social media platforms

Example:

Q: A coworker is posting racially offensive materials on social media and tagging other coworkers including me. What should I do?

A: Contact your supervisor or the compliance helpline about this issue as soon as possible. Any instance of potential discrimination, harassment or intimidation must be reported immediately.

We are building a thriving workplace

We value organizational justice

Accountability of Managers and Leaders

Each of us is responsible and accountable for living this Code – for conducting ourselves in accordance with its principles as we go about our daily work for the Company. Our leadership and managers play a crucial role in creating a culture of integrity in the Company. They are expected to not only lead with integrity but also to model ethical behavior for those they lead. It is vital that our Company's leaders create an environment within their teams where associates feel safe raising concerns and speaking up without fear of retaliation of any kind. Managers are also responsible for reporting any issues they become aware of including all concerns brought to them by their team members. Each manager is accountable for appropriately and promptly escalating all potential compliance issues and doing so in a way that protects the confidentiality of both the associate reporting the matter and those potentially involved, to the extent possible and/or to the extent appropriate under applicable law.

Duty to comply and speak up

Associates must comply with the principles set forth both here in this Code as well as with all Policies and are also required to disclose any potential violations of the Code and Policies. Associates can report potential issues to their supervisor, to any member of the human resources, legal or compliance teams, or can report them directly to the Ethics Line:

- For Rite Aid and Elixir associates: 888-748-3225 or via the website RiteAid.com/legal/fraud-ethics-compliance-hotline
- Health Dialog Ethics Line: 877-277-5900 x 4555

Associates who fail to report a potential violation they become aware of may be subject to discipline up to and including termination of employment where appropriate.

Example:

Q: "I observed a situation involving a repeat shoplifter that might violate our Code of Ethics and my supervisor observed it as well. When I talked to my supervisor about it, they told me to ignore it and not to do anything about it. What should I do now?"

A: "Disclosure of suspected violations of law, Company policy or this Code is critical to the well-being of the Company and is required of all associates. The situation you observed needs to be reported so it can be addressed appropriately. If you are not comfortable discussing it with your supervisor, you should use another one of the internal reporting channels available to you including raising the issue with someone in the human resources, legal or compliance teams or using the ethics helpline which can be reached here:

- Rite Aid Ethics Line (for Rite Aid and Elixir associates) at 888-748-3225 or via the website RiteAid.com/legal/fraud-ethics-compliance-hotline.
- Health Dialog Ethics Line: 877-277-5900 x 4555

The supervisor may be subject to discipline for their failure to report a potential Code violation. The Company prohibits retaliation against any associate reporting concerns in good faith."

We are building a thriving workplace

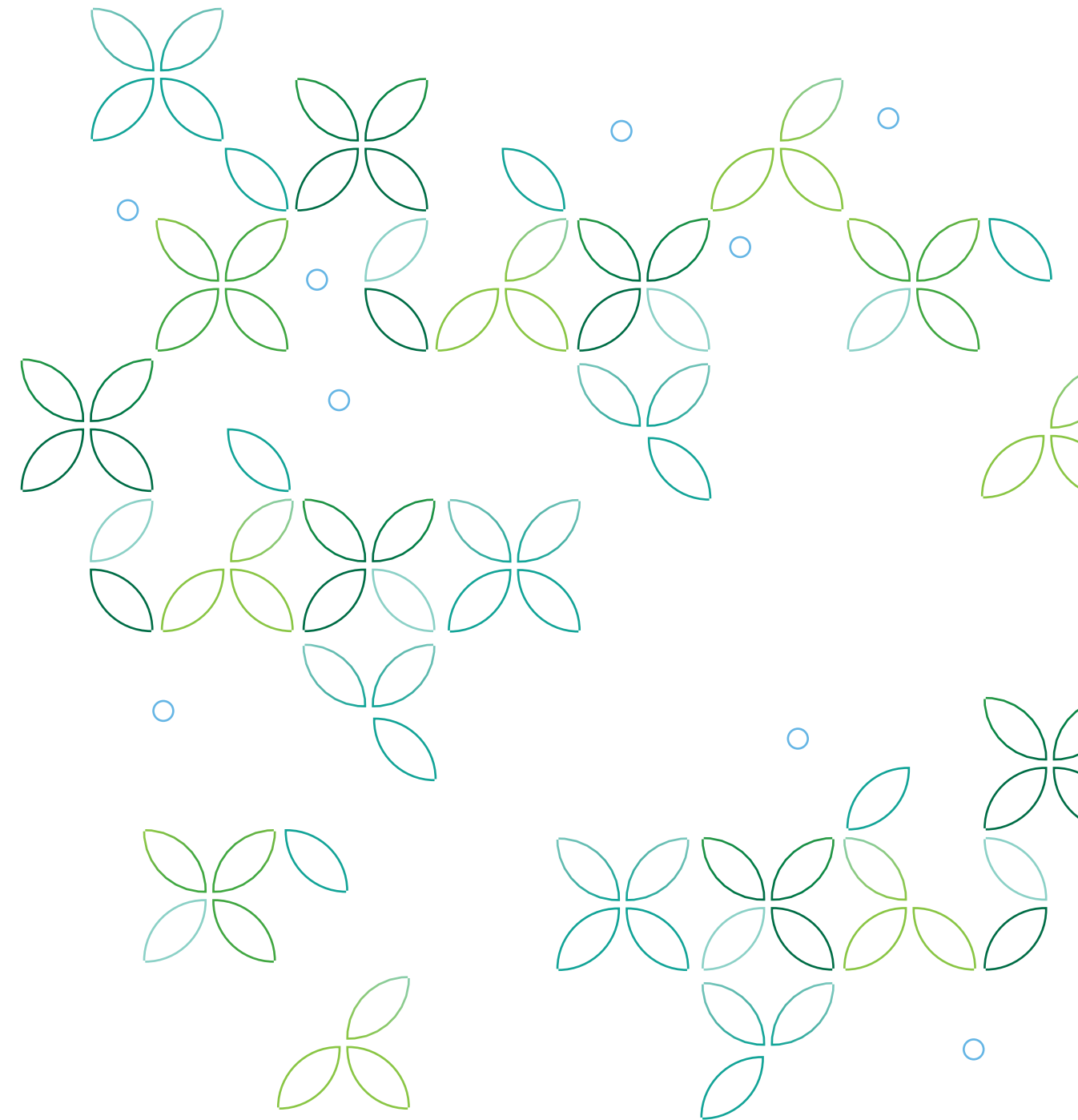
These mechanisms are in place to report and promptly investigate any potential violations of this Code of Ethics including, but not limited to, allegations of mistreatment, neglect, verbal, sexual or physical abuse, including injuries of unknown source and misappropriation of client or patient property by anyone furnishing services on behalf of the Company. We consistently hold ourselves and others accountable for ethical failures and will take disciplinary action when appropriate, up to and including termination of employment. We protect all whistleblowers and those who raise their hands in good faith and prohibit retaliation in all forms.

Protection For Speaking Up

Associates who engage in activities protected by law and/or Rite Aid policy, such as reporting harassment, discrimination, or other potential violations of this Code of Ethics, or of local, state, or federal law, or providing information or testimony during an investigation or prosecution of such a violation, are protected from retaliation. Speaking-up is a vital part of our company's ethical culture and we will not tolerate any forms of retaliation against those who do so.

This Code cannot cover every situation or answer every question you may have. Use this Code as well as other Company resources as a guide but should you have questions or concerns, please discuss them with your manager, your Human Resources representative, or a member of the Company's legal or compliance functions. You can also seek guidance about this Code by using the Company's Ethics Line.

- For Rite Aid and Elixir associates: 888-748-3225 or via the website RiteAid.com/legal/fraud-ethics-compliance-hotline.
- Health Dialog Ethics Line: 877-277-5900 x 4555



We are building a thriving workplace

We respect freedom of association

We are committed to positive and constructive labor relations with an open dialog which recognizes and respects the right of associates to be represented by trade unions or organizations established in accordance with applicable legislation including the right to collective bargaining.

We protect our associates

We are committed to creating safe workplaces for all of our associates. We have adopted and continuously improve occupational health and safety policies which implement preventive measures to minimize the potential for injury in our workplaces.

We expect a drug/alcohol free workplace

Associates are prohibited from working while under the influence of alcohol, drugs or other substances which could pose a risk to the safety of the associate or others in the workplace or using such substances on Company property. Smoking is prohibited in Company workplaces even where not prohibited by applicable law due to the harm of passive or second-hand smoke inhalation.

We ensure confidentiality of our associates' information

As part of the conduct of the Company's business operations, we may collect personal data through permissible means and commit to doing so in a way that safeguards the rights of each associate to control when, how and to what extent their personal data is collected, maintained, and processed by the Company. We abide by all applicable data privacy laws, and our own policies regarding associate and data privacy.

We provide associate training and education

The Company has an extensive compliance and safety education program designed to reinforce this Code and related policies and legal requirements. Certain courses are mandatory. It is the duty of all associates to complete mandatory compliance courses and the duty of managers to reinforce and ensure such completion. Associates who need a reasonable accommodation regarding mandatory compliance courses should contact their manager or a Human Resources representative. In addition to mandatory compliance training, other helpful courses including in-person educational opportunities are available by contacting your human resources, legal or compliance representative.

We are building a thriving workplace

We make ethical decisions

The Company is committed to the highest standards of integrity. We conduct business not only in compliance with all applicable laws but also in accordance with the ethical principles set forth in this Code.

This Code is intended to guide our treatment of one another, as well as our interactions with customers, suppliers, partners, public officials, and other stakeholders. We take personal responsibility for actively promoting ethical behavior in all our interactions and adhering to the highest standards of honesty, integrity, and accountability.

Q: Who is responsible for integrity at Rite Aid? How do I make ethical decisions when I am faced with a difficult situation?

A: Every one of us is responsible and accountable for acting with integrity and making ethical decisions – it is a responsibility we all share. When making a decision, first ask yourself:

- ➔ Is this decision consistent with our Company values?
- ➔ Does it comply with the principles of our Code?
- ➔ Is this decision good for the Company's reputation?
- ➔ Would I feel confident in this decision if it went viral or became headline news?
- ➔ Would I feel proud of this decision if I needed to explain it my friends or family?
- ➔ Is this decision in compliance with legal requirements?

If the answers to any of these questions is “No” or “I don’t know” — **STOP** and ask for guidance.

If you can confidently answer “yes” to all of these questions, it is likely an ethical decision.

We are building a thriving workplace

We are accountable for sound clinical decisions

Physicians, pharmacists, and other associates with responsibility for making clinical decisions must comply not only with this Code and Company Policies, but also with the specific requirements of their licenses and the applicable practice acts for their professions. Sound clinical decisions are vital to the health and safety of our customers and the success of our business.



We are building thriving communities

Supporting the communities where we live and work is a reflection of our core values and an important part of our brand. We are transparent in our interactions with public institutions and are fair, honest, and open in our communications about those interactions.

We Protect Our Customers and treat them with respect and fairness

We hold associates accountable for providing excellent service to our customers and patients and treating them with respect and fairness. We are committed to providing superior customer service and complying with our policies and any regulatory or contractual requirements. We do not discriminate, and we treat our customers with respect and integrity. We are professional in every interaction and serve people honestly and fairly.

Customers:

Include all those we serve, our patients, beneficiaries, plan sponsors, clients, and members.



We are building thriving communities

We ensure our associates are appropriately licensed and qualified

Many of our healthcare associates, such as our pharmacists, pharmacy technicians and nurses, are required to maintain current professional licensure, certification or registration and follow the code of ethics of their professional organization. We verify credentials and track renewal dates. Those who are credentialed have a responsibility to:

- Complete all required paperwork and requirements to obtain/maintain license/certification and remain in good standing.
- Notify the Human Resources department of any adverse changes in license or certification status.
- Follow the code of ethics of the applicable professional organization or license.

We protect customers' privacy and the security of their data

The federal HIPAA Privacy Regulation provides standards for protecting the medical information of our customers. It is our policy to conform to those standards. Through the course of employment, many of our associates will handle Protected Health Information (PHI). PHI is information that can identify an individual and his/her past, present, or future physical and/or mental condition(s). PHI information regarding patient or associate purchases or personal information (addresses, phone numbers, etc.) may not be provided to anyone other than the customer unless a written power of attorney is presented or otherwise as permitted by law. Such information is absolutely private, and it is our obligation to protect that privacy.

Appropriate associates are trained on PII and PHI annually. Completion of the training establishes that these responsibilities are understood. Violations of privacy regulations or policies will result in disciplinary action. More information on HIPAA privacy requirements may be found at

RiteAid.retailzipline.com/library/resources/305fb822-04-hipaa.

We are building thriving communities

We ensure our services are accessible to all and are prudent stewards of health care resources

We expect our associates to work to ensure the accessibility of information and services to all customers without regard to the language they speak, their reading level, visual or hearing impairment, and whether they have internet access or not. As part of this effort, we specifically work to reduce health disparities among disadvantaged populations and reach customers who may not have historically had access to care. Our associates are expected to continually look for ways to improve efficiency and ensure the most efficient use of health care resources. We ensure we provide our customers with accurate and honest disclosures that they are able to easily understand.



We are helping to ensure a thriving planet

We are committed to reducing our carbon footprint by conserving energy, improving fleet efficiency, avoiding the unnecessary generation of waste, and carrying out Company activities in ways that preserve and promote a clean, safe, and healthy environment.

The Company has implemented programs to help us maintain this commitment, such as a high performance retrofit lighting program, waste management programs, reducing fuel consumption, and an energy management system that reduces our overall electricity consumption. We also have more energy efficient store design specifications, construction, operation practices, and energy efficient equipment.

Our associates are expected to conduct every aspect of work safely and with the environment in mind. This includes using resources responsibly, conserving water and electricity, and diverting waste from landfills where recycling programs are available.

It is important that we follow all applicable environmental policies and laws, and we encourage others to do the same, including business partners and other third parties.

Our associates are expected to make every effort to prevent and report potential environmental violations to the Ethics hotline.

- For Rite Aid and Elixir associates: 888-748-3225 or via the website [RiteAid.com/legal/fraud-ethics-compliance-hotline](https://www.RiteAid.com/legal/fraud-ethics-compliance-hotline).
- Health Dialog Ethics Line: 877-277-5900 x 4555



Thank you

